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E-Filed

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

PERLA MARIA MEREZKO,
Debtor.

Case No: BKS-19-17398-btb
Chapter 13

DEBTOR'S OPPOSITION TO
TRUSTEE'S MOTION TO DISMISS

DATE: March 12, 2020
HEARING: 2:00 p.m.

NOTICE IS HEREBY GIVEN that PERLA MARIA MEREZKO ("Debtor") hereby files an
OPPOSITION TO TRUSTEE'S MOTION TO DISMISS. The Debtor will file a motion to modify
the plan to cure the infeasibility of the plan.

WHEREFORE, Debtor prays for the following:

1. That the Court denies Trustee's Motion to Dismiss;
2. For such other relief as this Court deems appropriate; and
3. For such other relief as this Court deems appropriate.

Dated: February 4, 2020

PRICE LAW GROUP, APC

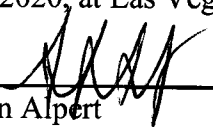

Steven Alpert
Attorney for Debtor

DECLARATION OF STEVEN ALPERT

I, STEVEN ALPERT, hereby declare as follows:

1. I am an attorney in the law firm of Price Law Group, APC and I am licensed to practice law before this United States Bankruptcy Court.
2. I have personal knowledge of the facts hereinafter set forth, and if called as a witness, I could and would testify competently thereto.
3. This office was retained by PERLA MARIA MEREZKO ("Debtor"), the Debtor in these proceedings, for the purpose of filing a Chapter 13 bankruptcy.
4. The Debtor will be modifying the plan to cure the infeasibility of the plan before the above-listed hearing.

I declare under penalty of perjury of the United States of America that the foregoing is true and correct and that this declaration was executed on February 4, 2020, at Las Vegas, Nevada.



Steven Alpert

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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:

PERLA MARIA MEREZKO,

Case No.: 19-17398-btb
Chapter 13

Debtor

CERTIFICATE OF SERVICE

1. On February 6, 2020 (*date*) I served the following document(s) (*specify*):

DEBTOR'S OPPOSITION TO TRUSTEE'S MOTION TO DISMISS

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

- ☒ a. ECF System (*You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary*)
- STEVEN A ALPERT enotice@pricelawgroup.com, alpert@pricelawgroup.com
 - KATHLEEN A. LEAVITT courtsecf3@las13.com
 -

- ☒ b. United States mail, postage fully prepaid
(List persons and addresses. Attach additional paper if necessary)

DEBTOR

Perla Merezko
7813 Riviera Beach Drive
Las Vegas, NV 89128

☐ **c. Personal Service** (*List persons and addresses. Attach additional paper if necessary*)

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the documents(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the documents(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ **d. By direct email** (as opposed to through the ECF System)
(*List persons and email addresses. Attach additional paper if necessary*)

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **e. By fax transmission** (*List persons and fax numbers. Attach additional paper if necessary*)

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ **f. By messenger** (*List persons and addresses. Attach additional paper if necessary*)

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. (A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

Signed on (date): February 6, 2020

Lidia Ramirez-Rivas
(NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)